

MEMO ENDORSED



U.S. Department of Justice

United States Attorney
Southern District of New York86 Chambers Street
New York, New York 10007

USDC SDNY

DOCUMENT

ELECTRONICALLY FILED

DOC#:

DATE FILED: 7/22/2025

July 22, 2025

VIA ECFHonorable Andrew L. Carter, Jr.
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007Re: *International Refugee Assistance Program v. U.S. Citizenship and Immigration Services*,
25 Civ. 4900 (ALC)

Dear Judge Carter:

I write with the consent of plaintiff's counsel in this Freedom of Information Act (FOIA) case to request a one-week extension of the government's time to answer or otherwise respond to the complaint, which is otherwise tomorrow, July 23, 2025.

This action concerns a FOIA request seeking a directive from U.S. Citizenship and Immigration Services (USCIS) ordering a "pause on adjudicating adjustment of status [] applications filed by refugees and asylees." Compl. ¶ 2, ECF No. 1. Yesterday, USCIS made a production that it believes satisfies plaintiff's request. The parties are conferring about appropriate next steps. In order to allow these discussions to continue without the press of immediate litigation deadlines, we respectfully request that the government's time to answer or otherwise respond to the complaint be extended by one week, or until July 30, 2025.

The parties thank the Court for its consideration of this submission.

Respectfully,

JAY CLAYTON
United States AttorneyBy: /s/ Peter Aronoff
PETER ARONOFF
Assistant United States Attorney
86 Chambers Street, 3rd floor
New York, NY 10007
Counsel for DefendantSO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

cc (via ECF): Counsel for plaintiff

July 22, 2025
New York, NY